

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(TRENTON VICINAGE)**

**LONGMEADOW ONE SOLAR LLC,  
et al.**

**Plaintiffs,**

**v.**

**TRINA SOLAR CO., LTD. et al.,**

**Defendants.**

**Civil Action No: 3:24-cv-03223-GC-JBD**

**NOTICE OF MOTION TO DISMISS  
THE SECOND AMENDED  
COMPLAINT**

Oral Argument Requested

**TO: THE CLERK OF THE COURT AND ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that as per the Court’s February 3, 2025 Order, on April 7, 2025 at 10:00 AM, or as soon thereafter as counsel may be heard, Defendant Trina Solar Co., Ltd. (f/k/a Changzhou Trina Solar Energy Co. Ltd.) (“TSL”), by and through their undersigned counsel, will move before the Court, at the United States District Court, District of Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an Order granting Defendant motion to dismiss pursuant to Federal Rules of Civil Procedure 12(b)(5)-(6) and to enter judgment thereupon.

**PLEASE TAKE FURTHER NOTICE** that in support of said Motion, Defendant will rely upon the Memorandum of Law of Trina Solar Co. Ltd., Declaration of Michael Nelson, the Declaration of Ruofei Xiang, the Request for Judicial Notice, and all accompanying exhibits submitted herewith, together with all prior pleadings and proceedings. A proposed form of the Order has also been submitted in support of this motion.

**PLEASE TAKE FURTHER NOTICE** that Defendant Trina Solar Co. Ltd. requests oral argument in the event this application is opposed.

Dated: February 17, 2025

Respectfully submitted,

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